

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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IN RE GENZYME CORP. )  
SECURITIES LITIGATION )  
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Consolidated Case  
No. 09-cv-11267 (GAO)

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**LEAD PLAINTIFFS' MOTION FOR LEAVE TO FILE**  
**NOTICE OF SUPPLEMENTAL AUTHORITY IN SUPPORT OF THEIR**  
**MOTION FOR RELIEF FROM FINAL JUDGMENT UNDER RULE 59**  
**TO AMEND ORDER AND JUDGMENT OF MARCH 30, 2012**  
**TO PROVIDE FOR DISMISSAL WITHOUT (RATHER THAN WITH) PREJUDICE**  
**AND TO GRANT LEAVE TO FILE AMENDED COMPLAINT UNDER RULE 15**

Lead Plaintiffs hereby move for leave to file a Notice of Supplemental Authority, attached hereto as Exhibit 1, to bring to the Court's attention the Eighth Circuit's recent decision in *Public Pension Fund Group v. Kva Pharm. Co.*, No. 10-3402 (8th Cir. June 4, 2012), which is relevant to Lead Plaintiffs' Motion for Relief from Final Judgment (Doc #102).

Dated: June 6, 2012

Respectfully submitted,

/s/ Bryan A. Wood  
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*Co-Lead Counsel for Lead Plaintiffs  
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the City of Edinburgh Council as  
Administering Authority of the Lothian  
Pension Fund, and the Government of  
Guam Retirement Fund*

**LOCAL RULE 7.1 (A)(2) CERTIFICATION**

Counsel for Lead Plaintiffs hereby certify, pursuant to Local Rule 7.1(a)(2), that Lead Plaintiffs' counsel have conferred with counsel for Defendants in a good faith effort to resolve and narrow the issues presented in this motion, and hereby state that the Defendants do not take any position on this motion.

/s/ Bryan A. Wood

**CERTIFICATE OF SERVICE**

I, Bryan A. Wood, hereby certify that the foregoing document, filed through the ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on June 6, 2012.

/s/ Bryan A. Wood